EXHIBIT A

COLE SCHOTZ P.C.

Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, NJ 07602-0800
201-489-3000 201-489-1536 fax

New York
Delaware
Maryland
Texas
Florida

Jason R. Melzer
Member
Admitted in NJ and NY

Reply to New Jersey Office
Writer's Direct Line: 201-525-6313
Writer's Direct Fax: 201-678-6313
Writer's E-Mail: jmelzer@coleschotz.com

January 15, 2025

Via Electronic Mail
Matthew S. Blum, Esq.
Rosenberg & Estis, P.C.
733 Third Avenue
New York, NY 10017

Re: **Tecspec LLC, et al. v. Michael Donnolo, et al.**
Civil Action No. 24 Civ. 8077 (JHR)

Dear Mr. Min:

We write regarding the above-captioned matter. As you are aware, on January 13, 2025, Judge Rearden ordered the parties to meet regarding the outstanding passwords and information that Plaintiffs still require in order to operate Tecspec LLC.

Below is a list of what Tecspec LLC requires:

1. All items marked in red in the network map attached hereto as Exhibit A;

2. All steps required for a "cold start," *i.e.* post power outage, all steps followed to begin all processes for the following machines:

   a) Haas Machine;

   b) Swiss lathe;

   c) Tiger Saw; and

   d) Laser machines.

3. With regards to the conveyor belt processes:

   a. How were the QR codes generated and applied?

b. Do these QR codes provide subcomponent traceability and how are the lookups done for that?

c. When the cameras scan the QR codes it will serialize an existing unit in the database after it passes all the tests, how are units initially entered into the database?

i. If it is a manual process, please document.

d. There are multiple versions of the conveyor.py script that use smaller portions of the belt - were these iterative or are these used for different components?

i. If literative, what is the latest version?

4. What is the startup process for the conveyor belt system in normal operation?

a. Which elements of the "conveyor belt ecosystem" need to be restarted on their own?

b. Are there scripts that need to be run concurrently with one another to have multiple moving parts or does conveyor.py handle it all?

i. Please specifically address the cameras in addition to other elements.

5. There are 6 kiosks and 6 test rigs, there is also pcam07, pcam08, pcam09, and pcam10. What are their functions?

6. How are the testrigX.py files run?

a) Does somebody need to take an action to trigger a job or are they part of a pipeline?

b) If they are triggered automatically, what is the trigger criteria?

c) If they are run manually, are there work instructions, documentation, etc. on what tests are used for what processes?

1. If yes, please provide.

7. Please share any documentation related to the calibration of testing equipment, including but not limited to:

a) How the tests were designed;

b) What the pass/fail criteria is;

c) What the calibration and configuration process is; and

d) All documentation around what tests are used for what assemblies.

If there is an yPRDs or other engineering documents related to the design and validation of this system, please provide same.

8. Per Tecspec VLan sheet, there are access points called apContainer and ap3. apContainer is near the Container office and ap3 near the dock wall far end as noted. Are these two items still active and if so where exactly are they located?

9. Where are the tpBridge2 (noted as inventory cart uplink) and tpBridge3 located on the floor or are they configured in the Cloudkey0 or Cloudkey1?

10. Does the Cloudkey0 or 1 use DNS?

a) Is there any special configuration on the cloudkeys for clients to access them?

11. Were all the Facility security cameras online accessed through the cloudkey1 Protect section? Please provide exactly where to find the following:

a) camF1; and

b) camF3.

12. Do all the devices such as the TVs (Kiosks around conveyor belt) need to access the TecspecProd wireless network to run the Python scripts?

a) Is there a list of the python scripts that ran through all the VMs?

1. If yes, please provide.

13. What does the linux computer on the CNC haas machine provide or control?

14. Please confirm the username and passwords for all the Ubiquit cameras, as the ones previously provided do not work.

15. Where are the Nozzles, Leveling Leg feet, and Leveling leg threaded rod programs and step files and other items that were made on the Swiss Lathe?

a) To the extent that such files were located on a USB key, Tecspec LLC is not in possession of the USB key.

16. Please provide **all** the End panel drawings;

17. Please identify and locate the program to tap the holes for the nozzles;

18. Please provide the name of the SQL program that runs the assembly line.

a) Where is the program located?

b) How is it executed?

19. Please provide the name and the function of all the Python script;

20. Regarding Two Penn Plaza, please provide:

a) the internal and external Wiring Diagrams; and

b) all the induction units with the sequence of operations and points list;

c) all the induction units and Central panel wiring diagrams with the sequence of operations and points list;

21. All Virtual Machine descriptions and what they do; and

22. Software used to program Belimo Valve, please see screenshot attached hereto as Exhibit B.

Please advise if Defendants are available for a video conference at **10:00 am on January 23, 2025** to discuss the above, as directed by Judge Rearden at the January 13, 2025 hearing. Should you have any questions, I am available to discuss this matter further.

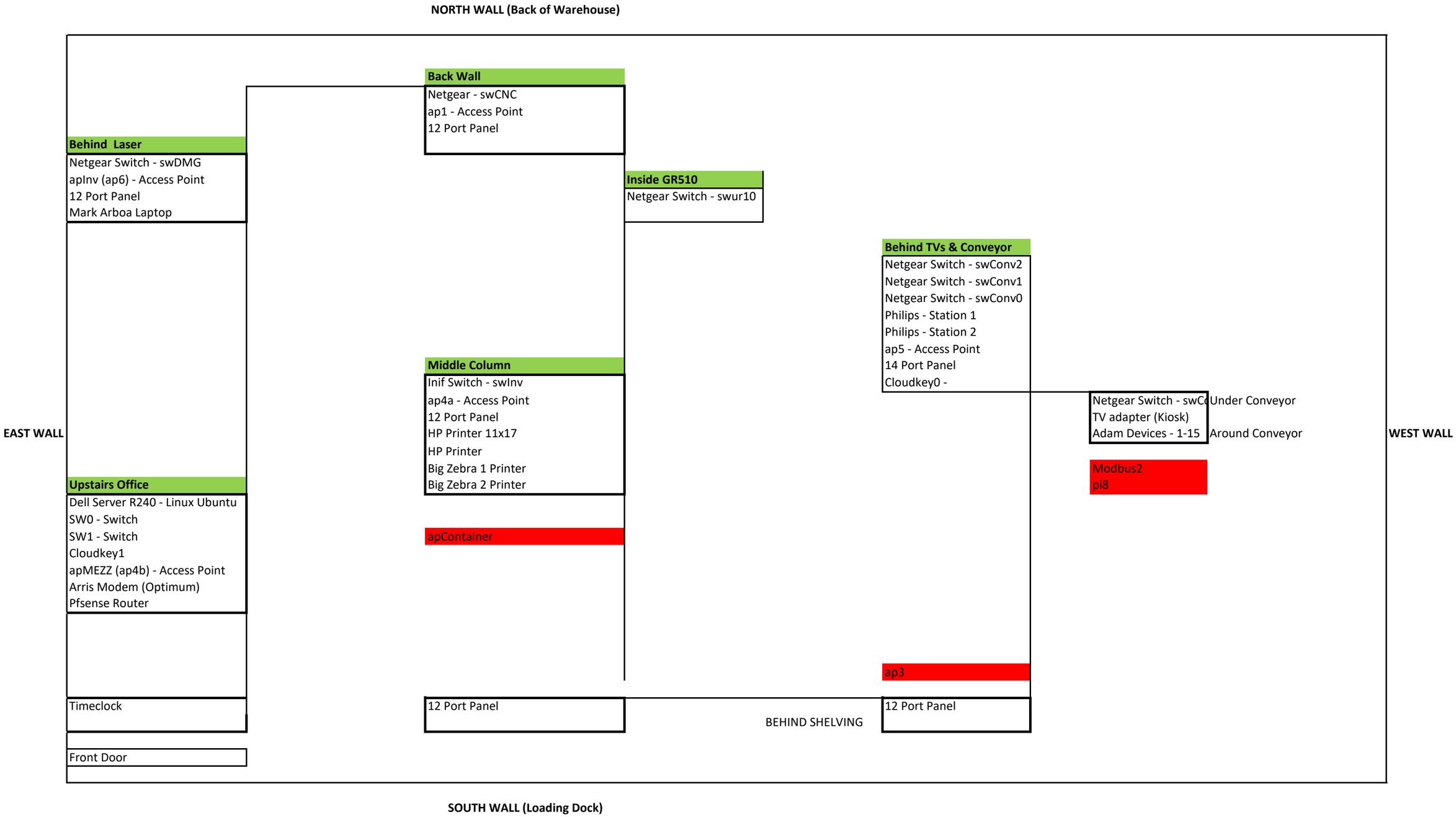
Plaintiffs reserve all rights.

Very truly yours,

COLE SCHOTZ P.C.

/s/ Jason R. Melzer

TECSPEC EQUIPMENT LOCATIONS



SOV
Tecspec SOV

TEMPERATURE 79 degF | HUMIDITY 55 %RH

System Schedule

Occupied Status	Schedule

Temperature Control

Active Temperature Setpoint	72.0
Current Temperatrure Setpoint	72.0
Setpoint Dial Adjustment Value	0.0
Setpoint Dial Adjustment Control	Disabled
Setpoint Dial Adjustment Range	0.0 °F
Occupied Temp Setpoint Direct	72.0 °F
Unoccupied Temp Setpoint Direct	80.0 °F
Maximum Temp Setpoint Direct	80.0 °F
Minimum Temp Setpoint Direct	68.0 °F
Occupied Temp Setpoint Reverse	70.0 °F
Unoccupied Temp Setpoint Reverse	55.0
Maximum Temp Setpoint Reverse	78.0
Minimum Temp Setpoint Reverse	55.0
Standby Temp Control	Disabled
Standby Temp Adjustment	0.0

PID Parameters

PID Action	2:Direct
PID Sensor Select	1:Sensor1
PID Propband	0.5
PID Integral	15.0
PID Derivative	0
PID Deadband	1 °F
PID Output Reverse	0.0 %
PID Outout Direct	100.0 %

Room Sensor (MP2)

Room Temperature	0.0 °F
Room Temperature Calibration Value	0.0
Room Setpoint Adjust Dial Position	0.0
Room Sensor Comm Enable	Disable
Room Fail - Valve Position for Rev	5:100% Open
Room Fail - Valve Position for Dir	1:Close

Return Air Temperature Sensor (S1) Parameters

Return Air Temperature (RAT)	75.7 °F
RAT Short - Valve Position for Rev	5:100% Open
RAT Short - Valve Position for Dir	1:Close
RAT Open - Valve Position for Rev	5:100% Open
RAT Open - Valve Position for Dir	1:Close
RAT Fail - Valve Position for Rev Acting	5:100% Open
RAT Fail - Valve Position for Dir Acting	1:Close
RAT Calibration Value	0.0 °F
RAT Short Threshold	250 °F
RAT Open Threshold	-45 °F
RAT Fail High Limit	120 °F
RAT Fail Low Limit	20 °F

Condensate Sensor (S2) Parameters

Condensate Sensor (CS) Resistance	46,228.0 Ohms
CS Alarm Resistance Threshold	40,000 Ohms
Condensate Alarm Valve Position	1:Close
CS Short - Valve Position for Rev	1:Close
CS Short - Valve Position for Dir Acting	1:Close
CS Open - Valve Position for Rev	1:Close
CS Short - Valve Position for Dir Acting	1:Close
CS Calibration Value	0.0 Ohms
CS Short Threshold	25 Ohms
CS Open Threshold	200,000 Ohms
CS Fail High Limit	300,000 Ohms
CS Fail Low Limit	1,000 Ohms

Power Up

Power Up Status	Inactive
Power Up Time Delay	0.0 sec
Power Up - Valve Position	5:100% Open
Power Up - VIV Position	5:Cfm Control

Network Heartbeat

Network Heatbeat	
Network Heartbeat Timeout	0.0 secs
Network Failure Valve Command	6:Auto

Alarms

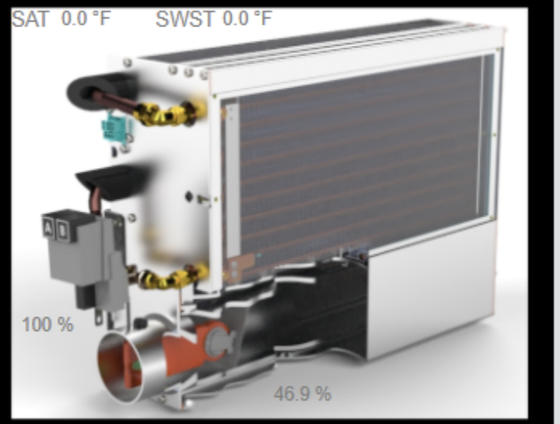
Common Alarm	
Condensate Alarm	
Valve Clutch Release Status	
Valve Position Fault	
RAT Fail - Out of Range	
RAT Sensor Short	
RAT Sensor Open	
CS Fail - Out of Range	
CS Short	
CS Open	
Room Sensor Comm Fail Alarm	
VAV Comm Fail Alarm	
VAV CFM Setpoint Not Achieved	
Power Up Active	

Valve

Valve Position Command	100 %
Valve Position Feedback	100 %
Valve Controlling Parameter	18:PID_Control
Remote Valve Control	Disabled
Remote Valve Control Command	0 %
Valve Position Fault Deadband	5.0 %
Remote Valve Alarm Input	Disabled
Remote Valve Alarm Position	1:Close

Pressure Independant Valve (PIV) GPM Control

PIV Valve Body Type	1:None
PIV GPM Control Mode	Enabled
PIV GPM Setpoint	0.0
PIV Maximum GPM	0.0 gpm
PIV Minimum GPM	0.1 gpm
PIV K Factor	0.25
PIV GPM Setpoint Adjust Factor	1.00
PIV GPM Setpoint Adjust Control	Disabled
PIV Occupied GPM Setpoint Rev	2.0
PIV Occupied GPM Setpoint Direct	2.1
PIV Unoccupied GPM Setpoint Rev	2.2
PIV Unoccupied GPM Setpoint Direct	2.3



Primary Air VAV Control

Damper Position	46.9 %
VAV CFM	31.0 cfm
VAV CFM Set Point	30.0
VAV K Factor	1.000
Inlet Air Temperature	76.8 °F
Inlet Air Temperature Calibration	0.0
VAV Maximum CFM	121.0 cfm
VAV Minimum CFM	10.0 cfm
Inlet Duct Size	4.0 in
VAV CFM Setpoint Adjust Factor	1.00
VAV CFM Setpoint Adjust Control	Off
VAV CFM Not Achieved Deadband %	10.0
VAV CFM Not Achieved Timer	30.0
VAV Occupied CFM Setpoint Rev	50.0
VAV Occupied CFM Setpoint Direct	30.0
VAV Unoccupied CFM Setpoint Rev	52.0
VAV Unoccupied CFM Setpoint	0.0
VAV Control Mode	5:Cfm Control
VAV Comm Enable	On